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Attorneys for Federal Defendants and
Defendant United States of America.

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CALIFORNIA COALITION FOR WOMEN
PRISONERS; R.B.; A.H.R.; S.L.; J.L.; J.M.;
G.M.; A.S.; and L.T., individuals on behalf of
themselves and all others similarly situated,

Plaintiffs

v.

UNITED STATES OF AMERICA FEDERAL
BUREAU OF PRISONS, a governmental entity;
BUREAU OF PRISONS DIRECTOR
COLETTE PETERS, in her official capacity;
FCI DUBLIN WARDEN THAHESHA JUSINO,
in her official capacity; OFFICER
BELLHOUSE, in his individual capacity;
OFFICER GACAD, in his individual capacity;
OFFICER JONES, in his individual capacity;
LIEUTENANT JONES, in her individual
capacity; OFFICER LEWIS, in his individual
capacity; OFFICER NUNLEY, in his individual
capacity; OFFICER POOL, in his individual
capacity; LIEUTENANT PUTNAM, in his
individual capacity; OFFICER SERRANO, in
his individual capacity; OFFICER SHIRLEY, in
his individual capacity; OFFICER SMITH, in his
individual capacity; and OFFICER VASQUEZ,
in her individual capacity,

Defendants.

CASE NO. 4:23-CV-04155-YGR

UNITED STATES' APRIL 12, 2024 NOTICE

FILED UNDER SEAL

1 In compliance with the Court's Order at Doc. 88, the United States of America respectfully
 2 notifies the Court of its intent to transfer the following adults in custody (AICs) from FCI Dublin:

- 3 • Alexis Anderson,
- 4 • Claudia Elizabeth Avila Hernandez,
- 5 • Roberta Bell,
- 6 • Kendra Drysdale,
- 7 • Rosa Espinosa de Excinia,
- 8 • Rhonda Fleming,
- 9 • Yolonda Herrera de Martinez,
- 10 • Sheila Linares,
- 11 • Tyra Mabon,
- 12 • Stephanie Madsen,
- 13 • Monica Metcalf,
- 14 • Maryra Miranda,
- 15 • Latryce Marie Reid-Pitre,
- 16 • Julissa Poor Bear,
- 17 • Evangelina Roberts,
- 18 • Arianna Soohafyah,
- 19 • Anabel Valenzuela, and
- 20 • Flerida Vianey Gonzalez Burgos.

21 Each of these individuals were listed on the parties' witness lists, and many of them also
 22 testified at the evidentiary hearing. These individuals, along with the remainder of the inmate
 23 population, will be transferred from FCI Dublin in the coming week due to the closure of the facility.

24 As explained in Docs. 236-2, 236-4, this information is highly sensitive. Disclosure of such
 25 information to the public, to inmates, and even to opposing counsel would be detrimental to facility
 26 management and would increase risk to BOP staff and inmates alike. Mindful of the ongoing safety and
 27 security concerns, counsel for the United States respectfully requests that the Court keep this highly
 28 sensitive information and this filing under seal and *ex parte* until such time as this information is

1 appropriate for broader release. As noted in Doc. 236-4, counsel for the United States has the same
2 security concerns if this information is released only to a single member of Plaintiffs' legal team. But the
3 United States defers to the Court on if, when, and how to disclose the information in this notice to
4 Plaintiffs' counsel. To the extent any such disclosure of this information is made only to a single
5 member of Plaintiffs' legal team prior to BOP's broader release, which is likely to occur Monday, April
6 15, 2024, the government requests that the Court enter a protective order to ensure the strictest
7 confidentiality of this information.

8 Dated this 12th day of April, 2024.

9
10 JESSE A. LASLOVICH
11 United States Attorney

12 /s/ Madison L. Mattioli
13 MADISON L. MATTIOLI
14 ABBIE J.N. CZIOK
15 MARK STEGER SMITH
16 TIMOTHY A. TATARKA
17 Assistant U.S. Attorneys
18 Attorneys for Federal Defendants
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